

Tim Murphy is boss

Prep for ETICAM

Nancy Alvarez:

NV DEP has not yet approved the change of ownership so the facility is still called Eticam. (Regulated under Permit H. 12. Transfer of Permits.)

TO DISCUSS with NV DEP:

The September, 1994 inspection included no violations. The report is not available. We should review the 3/94 and 9/94 reports in Carson City.

What is the minimum percent of reclaimable metals that have to be in sludge sent to smelters as a product? What record-keeping is required by Eticam? Smelters?

What's the latest on whether or not sludge as product being shipped to smelters goes off-site with a manifest?

Discuss reason NV DEP asked fac. to submit variance.

Nancy prepared a memo explaining that the facility advertises as a recycler but that it functions as an intermediary/broker preparing HWS to go to smelters for metal recovery. In the past catalyst process solids were received and when no treatment seemed practical the entire shipment went directly to a landfill. (See Criterion Catalyst info from 1993 Biennial report.) NV isn't doing anything about it because ETICAM is not violating their TSD permit.) CA generators indicate the recycling code on their manifests and pay a reduce annual fee to CA Board of Equalization. The only current regulatory issue is whether or not the generator requirement to have a cradle-to-grave paper trail is being violated. CA generators receive a signed copy of the manifest on which they are indicated recycling...is ETICAM correcting that entry?

Primarily receives HWS with metals. Precipitate metals out and stabilized pH metallic sludge sent to smelters for metals recovery. The wastewater is crystallized and set off-site to landfill as salt.

1994 manifests-

Shametco 1994 shipped material is it going w manifest what codes and contract

HW to smelters - Have they attached a LDR form. Are the smelters required to notify? If reg. under 266 then you need LDR.

Certification language of 3.80 not same as 268.7(a)(2)(D)(ii).

1994 ^{Alvarez suggested they} asked them to submit a variance because they are an intermediary preparing material for shipment to smelters for metals recovery.

ETICAM

Field Inspection

SECURITY - 444.8875 and 264.14(b)&(c).

- . Controlled entry
- . "Danger - Unauthorized Personnel Keep Out" at each entrance in English and language predominant in area.

STORAGE - Sludges generated will be stored in containers and tanks and regulated by subparts I and J of 264 and 262.34, and removed within 90 days. Permit Parts II, III, IV.

- 264:I: 171 - Containers in good condition
- 172 - Compatible with wastes
- 173 - Closed except when adding or removing waste.
 - Handled to prevent ruptures or leaks.
- 174 - Inspected weekly
- 175 - Containment system free of cracks or gaps
 - Large enough to retain 10% of capacity.
 - Spill, leaks, run-on removed from sump or collection system often enough to prevent overflow.
- 176 - Ignitable & reactives 50 feet from property line
- 177 - Separation, non-mixture of incompatibles.
- 264:J 193 - Secondary containment which prevents release
 - Protective coating free of cracks, gaps.
- 195 - Maintain records of daily inspections for releases, corrosion

Preparedness and Prevention

Permit Part II, E.

1. Required equipment as listed in Contingency Plan (Att. 4) NAC 444.8905 and 264.32.
2. Testing and maintenance of required equipment. 264.33
3. Access to Communications or Alarm System. NAC 444.8910 and 264.34.
4. Required aisle space as shown in plans and specifications of attached 5. NAC 444.8915 and 264.35.
5. Arrangements with Local Authorities. 444.8920 and 264.37.
6. Water for Fire Control. Adequate volume and pressure to supply water hose systems or automatic sprinkler systems NAC 444.8905 and 264.32(d)

Foreign Sources. Notify NDEP 4 wks. in advance. Permit Part II, K.1.

RECORD REVIEWS

Documents to be maintained at the site:

Waste analysis plan, NAC 444.8870/264.13 & Permit Part II, B. Source SW846.

- When last updated?
- Does update include all codes now handled 264.13(b)(1)?
- What resolution occurred the last time incoming failed to match profile? Any report to NV DEP?

Personnel training records NAC 444.8890/264.16(d) & (e) Permit II, D.

- 1 each hired since June, 1994 from Tank, drum, laboratory
- 1 instructors credentials
- 1 training certificate for Confined Space Entry work ↗
- Program directed by trained person.
- Curriculum to train handlers to operate safely and respond to emergencies
- Training completed within 6 months of hiring.
- Annual reviews documented.

Contingency plan NAC 444.8925/264.53(a), Permit Part II, F. Copy of report when last implemented.

When last updated? NAC 444.8925 and 264.54.

Current listing for the Emergency Coordinator? 444.8930 264.56.

Emergency procedures followed? 444.8935, 8940, 8945, 8950 and 264.56.

Closure plan NAC 444.9030/264.112(a)

When last amended? Permit Part II, H. 2., 444.9045 & 264.112 (b).

Annually-adjusted cost estimate for facility closure required by NAC 444.9050/264.142(d) Permit Part II, I. 1.

Proof of Financial Assurance for Closure - Permit Part II N. 444.9070 and 264.151. in at least the amount of the cost estimate.

Proof of current liability coverage, Permit Part II, O.

Operating record NAC 444.8970/264.73 (a)&(b)(1-8) and Part II, Section G.1 of the permit.

Inspection schedules and logs as required by NAC 444.8885/264.15(b) Permit Part II, C.

Other documents required by Part I, Sections E and F, and Part II, Sections A thru P of this permit

*last plan
was prev.
is there a new
one?*

*Air
Emission*

Monitoring reports shall be retained for three years and be dated, have exact place, a times of sampling or measurements. List names of samplers or monitors, dates analyses are performed, who did analyses, methods used and results.

*Copy of ltr sent to generators notifying
what Eticam is permitted to do.*

- 3 years of manifests